

SCOTT N. SCHOOLS (SC 9990)  
United States Attorney

MARK L. KROTOSKI (CASBN 138549)  
Chief, Criminal Division

MATTHEW A. PARRELLA (NYSBN 2040855)  
JEFFREY D. NEDROW (CASBN 161299)  
JEFFREY R. FINIGAN (CASBN 168285)  
Assistant United States Attorneys

450 Golden Gate Avenue  
San Francisco, California 94102  
Telephone: (415) 436-7232  
Facsimile: (415) 436-7234  
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
TREVOR GRAHAM, )  
 )  
Defendant. )

Criminal No. CR 06-0725 SI

**STIPULATION AND [PROPOSED]  
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on March 30, 2007, for trial setting. The defendant was represented by Gail Shifman, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to June 22, 2007, for hearing on defense motions, September 11, 2007, for pre-trial conference, and September 24, 2007 in this Court for trial.

The Court made a finding that the time from and including March 30, 2007, through

September 24, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until September 24, 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: April 20, 2007

/s/  
GAIL SHIFMAN  
Counsel for Trevor Graham

DATED: March 30, 2007

/s/  
JEFFREY FINIGAN  
Assistant U.S. Attorney

So ordered.

DATED:

  
SUSAN ILLSTON  
UNITED STATES DISTRICT COURT JUDGE